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CLERK OF COURT  
SOUTHERN DISTRICT OF CALIFORNIABY Rm DEPUTYUNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2006 Grand Jury

11	UNITED STATES OF AMERICA,	)	07 CR 0449 WQH Criminal Case No. <u>WQH</u>
12	Plaintiff,	)	<u>I N D I C T M E N T</u>
13	v.	)	Title 21, U.S.C., Secs. 846 and
14	VICTOR EMILIO	)	841(a)(1) - Conspiracy to
15	CAZARES-GASTELLUM (1),	)	Import a Controlled Substance;
16	aka Victor Emilio	)	Title 21 U.S.C.,
17	Cazares-Salazar,	)	Secs. 952, 960 and 963 -
18	aka Licenciado,	)	Conspiracy to Distribute a
19	aka Lic,	)	Controlled Substance; Title 21,
20	aka Viejo,	)	U.S.C., Secs. 848(a) and (b) -
21	JOSE OSCAR DEL	)	Continuing Criminal Enterprise;
22	CASTILLO-GALLARDO (2),	)	Title 18, U.S.C., Sec. 1956(h) -
23	aka Chama,	)	Conspiracy to Launder Monetary
24	aka Shrek,	)	Instruments; Title 21, U.S.C.,
25	CARLOS CUEVAS JR. (3),	)	Sec. 841(a)(1) - Distribution of
26	aka Charlie,	)	a Controlled Substance;
27	aka Sapo,	)	Title 21, U.S.C., Secs. 952 and
28	aka Negro,	)	960 - Importation of a Controlled
	SERGIO KAISER-CHAVEZ (4),	)	Substance; Title 21, U.S.C.,
	aka Zepi,	)	Sec. 841(a)(1) - Possession with
	aka Cepillin,	)	Intent to Distribute a Controlled
	SANTOS FABIAN ROCHA SALAZAR (5),	)	Substance; Title 18, U.S.C.,
	aka Pariente,	)	Sec. 2 - Aiding and Abetting;
	aka Chino,	)	Title 21, U.S.C., Sec. 853 -
	CARLOS VALLE-CASTORENA (6),	)	Criminal Forfeiture
	aka Carrocero,	)	
	aka Pintor,	)	

MLK/OBG:jla:San Diego  
2/23/07

1 vaj

1 MIGUEL ANGEL CARDENAS )  
     GARCIA (7), )  
 2     aka Mickey Mouse, )  
     aka Mike, )  
 3 JOSE ISMAEL URQUIZA (8), )  
     aka Conchi, )  
 4 LUIS EDUARDO ALVAREZ (9), )  
     aka Lalo, )  
 5 KARLO HUMBERTO )  
     ARMENTA-OCAMPO (10), )  
 6     aka Pescador, )  
 GILBERT VASQUEZ-CHAVEZ (11), )  
 7     aka Vaca, )  
     aka Luis Miguel, )  
 8     aka Gil, )  
 OCTAVIO AMEZCUA (12), )  
 9     aka Russo, )  
 ROSARIO GARCIA-CARDENAS (13), )  
 10     aka Chayo, )  
 GASPAR PUENTES HERRERA (14), )  
 11     aka Casper, )  
 ARTURO GUARDADO-CHAIDEZ (15), )  
 12 ELISA VALENZUELA PENA (16), )  
     aka Melissa, )  
 13 TONY RAMOS (17), )  
     aka Antonio Ramos Amezcua, )  
 14 ARTURO FLORES MEDINA (18), )  
 ROBERTO DANIEL LOPEZ (19), )  
 15 )  
                     Defendants. )  
 16 \_\_\_\_\_ )

17  
18       The grand jury charges:

19                               Count 1

20                               CONSPIRACY TO IMPORT CONTROLLED SUBSTANCES

21       1.   At all times relevant to this indictment:

22           a.   VICTOR EMILIO CAZARES-GASTELLUM, aka Victor Emilio  
 23   Cazares-Salazar, aka Licenciado, aka Lic, aka El Señor, aka El Viejo,  
 24   is the head of a large-scale distribution organization (Cazares  
 25   Organization) that sends metric ton-quantities of cocaine from Mexico  
 26   into the United States.   The Cazares Organization was the primary  
 27   source-of-supply   for   cocaine   imported   and   distributed   by  
 28

1 CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, and his  
2 associates, referred to herein as the "Cuevas Cell."

3 b. JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama,  
4 aka Shrek, was the son-in-law of VICTOR EMILIO CAZARES-GASTELLUM,  
5 aka Victor Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El  
6 Señor, aka El Viejo. JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama,  
7 aka Shrek, acted as a liaison between his father-in-law and the  
8 Cuevas Cell. Additionally, JOSE OSCAR DEL CASTILLO-GALLARDO,  
9 aka Chama, aka Shrek, himself exported marijuana and multi-pound  
10 quantities of methamphetamine to the United States from Mexico  
11 through the assistance of the Cuevas Cell.

12 c. CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro,  
13 was the head of a narcotics transportation cell, referred to as the  
14 Cuevas Cell, operating from Imperial County, California. As the head  
15 of the Cuevas Cell, CARLOS CUEVAS JR., aka Charlie, aka Sapo,  
16 aka Negro, employed multiple individuals to assist with importing  
17 narcotics from Mexico to the United States, and then transporting the  
18 narcotics to other domestic locations. Although primarily employed  
19 to import and transport narcotics by VICTOR EMILIO CAZARES-GASTELLUM,  
20 aka Victor Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El  
21 Señor, aka El Viejo, the Cuevas Cell engaged in similar narcotics-  
22 related business with other unidentified narcotics suppliers located  
23 in Mexico.

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1           d.    SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, was a  
2 member of the Cuevas Cell who acted at the direction of CARLOS  
3 CUEVAS JR., aka Charlie, aka Sapo, aka Negro. SERGIO KAISER-CHAVEZ,  
4 aka Zepi, aka Cepillin, primarily acted as a manager/supervisor and  
5 managed the narcotic load-vehicle coordinators employed by the Cuevas  
6 Cell.

7           2.    At various times material to this indictment:

8           a.    SANTOS FABIAN ROCHA-SALAZAR, aka Pariente, aka Chino,  
9 was a member of a narcotics-trafficking organization (the "Cuevas  
10 Cell") whose activities involved packaging cocaine for transportation  
11 and secreting cocaine within load-vehicles. SANTOS FABIAN ROCHA-  
12 SALAZAR, aka Pariente, aka Chino, also assisted the Cuevas Cell by  
13 locating a source of supply for cocaine within Mexico.

14           b.    CARLOS VALLE-CASTORENA, aka Carrocero, aka Pintor, was  
15 a member of the Cuevas Cell whose primary responsibility consisted  
16 of loading vehicles with narcotics for future transportation by other  
17 members of the Cuevas Cell.

18           c.    MIGUEL ANGEL CARDENAS GARCIA, aka Mickey Mouse,  
19 aka Mike, was a member of the Cuevas Cell who acted as a "lookout"  
20 or guide for drivers of narcotic-laden vehicles. MIGUEL ANGEL  
21 CARDENAS GARCIA, aka Mickey Mouse, aka Mike, also acted as a load-  
22 vehicle coordinator with the responsibility of locating drivers for  
23 narcotic-laden vehicles.

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1           d.     JOSE ISMAEL URQUIZA, aka Conchi, was a member of the  
2 Cuevas Cell who acted as a "lookout" or guide for drivers of  
3 narcotic-laden vehicles.     Additionally, JOSE ISMAEL URQUIZA,  
4 aka Conchi, was often tasked by either CARLOS CUEVAS JR.,  
5 aka Charlie, aka Sapo, aka Negro, or SERGIO KAISER-CHAVEZ, aka Zepi,  
6 aka Cepillin, with purchasing new cellular phones for members of the  
7 Cuevas Cell, which were subsequently used by various members of the  
8 cell to facilitate their drug trafficking activities.

9           e.     LUIS EDUARDO ALVAREZ, aka Lalo, was a member of the  
10 Cuevas Cell who was responsible for recruiting and handling drivers  
11 who transported narcotics on behalf of the Cuevas Cell.

12           f.     GILBERT VASQUEZ-CHAVEZ, aka Vaca, aka Luis Miguel,  
13 aka Gil, was a member of the Cuevas Cell who was primarily  
14 responsible for driving narcotic-laden vehicles and returning  
15 narcotics proceeds on behalf of the Cuevas Cell. GILBERT VASQUEZ-  
16 CHAVEZ, aka Vaca, aka Luis Miguel, aka Gil, was also responsible for  
17 recruiting drivers of narcotic-laden vehicles for the Cuevas Cell.

18           g.     OCTAVIO AMEZCUA, aka Russo, was a member of the Cuevas  
19 Cell whose primary responsibility consisted of overseeing the  
20 importation and transportation of marijuana for the Cuevas Cell.  
21 OCTAVIO AMEZCUA, aka Russo, also assisted with storing vehicles used  
22 by the Cuevas Cell to transport narcotics.

23           h.     ROSARIO GARCIA-CARDENAS, aka Chayo, was a narcotics  
24 load-vehicle driver for the Cuevas Cell.

25           i.     GASPAR PUENTES HERRERA, aka Casper, was a marijuana  
26 stash house operator for the Cuevas Cell and was occasionally a  
27 narcotics load-vehicle driver.

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1           j.     ARTURO GUARDADO-CHAIDEZ was a member of the Cuevas  
2 Cell who coordinated marijuana loads imported from Mexico.  
3 ARTURO GUARDADO-CHAIDEZ was also involved in the packaging  
4 of methamphetamine that was imported by the Cuevas Cell on  
5 October 11, 2006.

6           k.     KARLO HUMBERTO ARMENTA-OCAMPO, aka Pescador, was  
7 employed by the Cuevas Cell as a load-vehicle coordinator,  
8 responsible for locating drivers for narcotic-laden vehicles.

9           l.     ELISA VALENZUELA PENA, aka Melissa, was employed by  
10 CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, to locate  
11 tractor-trailer drivers to transport narcotics on behalf of the  
12 Cuevas Cell. Additionally, ELISA VALENZUELA PENA, aka Melissa,  
13 transported narcotics proceeds for the Cuevas Cell.

14           m.     ROBERTO DANIEL LOPEZ was a member of the Cuevas Cell  
15 who acted as a "lookout" or guide for drivers of narcotic-laden  
16 vehicles.

17           n.     TONY RAMOS, aka Antonio Ramos Amezcua, was a narcotics  
18 load-vehicle driver for the Cuevas Cell.

19           o.     ARTURO FLORES MEDINA, was a narcotics load-vehicle  
20 driver for the Cuevas Cell.

21           3.     Beginning on a date unknown to the grand jury and  
22 continuing up to and including February 28, 2007, within the Southern  
23 District of California, and elsewhere, defendants VICTOR EMILIO  
24 CAZARES-GASTELLUM, aka Victor Emilio Cazares-Salazar, aka Licenciado,  
25 aka Lic, aka El Señor, aka El Viejo, JOSE OSCAR DEL CASTILLO-  
26 GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie,  
27 aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin,  
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1 SANTOS FABIAN ROCHA SALAZAR, aka Pariente, aka Chino, CARLOS VALLE-  
2 CASTORENA, aka Carrocero, aka Pintor, MIGUEL ANGEL CARDENAS GARCIA,  
3 aka Mickey Mouse, aka Mike, JOSE ISMAEL URQUIZA, aka Conchi, LUIS  
4 EDUARDO ALVAREZ, aka Lalo, GILBERT VASQUEZ-CHAVEZ, aka Vaca, aka Luis  
5 Miguel, aka Gil, OCTAVIO AMEZCUA, aka Russo, ROSARIO GARCIA-CARDENAS,  
6 aka Chayo, GASPAR PUENTES HERRERA, aka Casper, ARTURO GUARDADO-  
7 CHAIDEZ, KARLO HUMBERTO ARMENTA-OCAMPO, aka Pescador, ARTURO FLORES  
8 MEDINA, TONY RAMOS, aka Antonio Ramos-Amezcu, and ROBERTO DANIEL  
9 LOPEZ, did knowingly and intentionally conspire and agree with each  
10 other and with others known and unknown to the grand jury, to import  
11 5 kilograms and more of cocaine, a Schedule II Controlled Substance,  
12 50 grams and more of methamphetamine, a Schedule II Controlled  
13 Substance, and 1,000 kilograms and more of marijuana, a Schedule I  
14 Controlled Substance; in violation of Title 21, United States Code,  
15 Sections 952, 960, and 963.

16 **METHOD AND MEANS**

17 As part of and to facilitate the charged conspiracy, the  
18 conspirators, both named and unnamed, did utilize the following  
19 method and means, among others:

20 4. VICTOR EMILIO CAZARES-GASTELLUM, aka Victor Emilio Cazares-  
21 Salazar, aka Licenciado, aka Lic, aka El Señor, aka El Viejo, sent  
22 metric ton-quantities of cocaine to Mexicali, Mexico, to be exported  
23 to the United States through the assistance of the Cuevas Cell and  
24 other unidentified narcotics transportation organizations;

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1           5. Defendant CARLOS CUEVAS JR., aka Charlie, aka Sapo,  
2 aka Negro, and other individuals within the Cuevas Cell delegated to  
3 do so, would locate and purchase used vehicles with which to  
4 transport narcotics;

5           6. As a method of concealing the narcotics within vehicles  
6 purchased by the Cuevas Cell, CARLOS CUEVAS JR., aka Charlie,  
7 aka Sapo, aka Negro, would send the vehicles to be outfitted by other  
8 co-conspirators with secret compartments;

9           7. Defendant CARLOS CUEVAS JR., aka Charlie, aka Sapo,  
10 aka Negro, arranged for narcotics obtained from within Mexico to be  
11 packaged by various co-conspirators in Mexico and then loaded into  
12 vehicles for transportation across the United States-Mexico border  
13 and then to other domestic locations;

14           8. Defendant CARLOS CUEVAS JR., aka Charlie, aka Sapo,  
15 aka Negro, or SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, at the  
16 direction of CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro,  
17 would contact various co-conspirators and task these individuals with  
18 locating drivers for the narcotic-laden vehicles;

19           9. In order to protect against law enforcement detection,  
20 CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, or others at his  
21 direction, would employ individuals to act as a scout or "lookout"  
22 for narcotic-laden vehicles;

23           10. Defendants, along with other co-conspirators, discussed  
24 narcotics-related activity in person and over communications  
25 equipment, using various codes to disguise their identities and the  
26 meaning of their conversation.

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Count 2CONSPIRACY TO DISTRIBUTE CONTROLLED SUBSTANCES

1. Paragraphs 1-2 and 4-10 of Count 1 of this Indictment are realleged and incorporated by reference as though fully set out herein.

2. Beginning on a date unknown to the grand jury and continuing up to and including February 28, 2007, within the Southern District of California, and elsewhere, defendants VICTOR EMILIO CAZARES-GASTELLUM, aka Victor Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El Señor, aka El Viejo, JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, SANTOS FABIAN ROCHA SALAZAR, aka Pariente, aka Chino, CARLOS VALLE-CASTORENA, aka Carrocero, aka Pintor, MIGUEL ANGEL CARDENAS GARCIA, aka Mickey Mouse, aka Mike, JOSE ISMAEL URQUIZA, aka Conchi, LUIS EDUARDO ALVAREZ, aka Lalo, GILBERT VASQUEZ-CHAVEZ, aka Vaca, aka Luis Miguel, aka Gil, OCTAVIO AMEZCUA, aka Russo, ROSARIO GARCIA-CARDENAS, aka Chayo, GASPAR PUENTES HERRERA, aka Casper, ARTURO GUARDADO-CHAIDEZ, KARLO HUMBERTO ARMENTA-OCAMPO, aka Pescador, ARTURO FLORES MEDINA, TONY RAMOS, aka Antonio Ramos-Amezcu, and ROBERTO DANIEL LOPEZ, did knowingly and intentionally conspire and agree with each other and with others known and unknown to the grand jury, to distribute 5 kilograms and more of cocaine, a Schedule II Controlled Substance, 50 grams and more of methamphetamine, a Schedule II Controlled Substance, and 1,000 kilograms and more of marijuana, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Count 3CONTINUING CRIMINAL ENTERPRISE

Beginning on a date unknown to the grand jury and continuing up to and including February 28, 2007, within the Southern District of California, and elsewhere, defendants VICTOR EMILIO CAZARES-GASTELLUM, aka Victor Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El Señor, aka El Viejo, JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, and SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, did knowingly and intentionally engage in a continuing criminal enterprise by violating various provisions of the Controlled Substances Act (Title 21, United States Code, Sections 841, 846, 952, 960 and 963), the felony offenses alleged in Counts 1, 2, 9, 16 of the Indictment, which offenses were part of a continuing series of violations of said Act involving more than 150 kilograms of cocaine and more than 1.5 kilograms of methamphetamine (actual) and were undertaken by defendants VICTOR EMILIO CAZARES-GASTELLUM, aka Victor Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El Señor, aka El Viejo, JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, and SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, in concert with at least five other persons with respect to whom defendants VICTOR EMILIO CAZARES-GASTELLUM, aka Victor Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El Señor, aka El Viejo, JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, and SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, occupied a position of principal administrator,

1 organizer and leader, and from which such continuing series of  
2 violations defendants VICTOR EMILIO CAZARES-GASTELLUM, aka Victor  
3 Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El Señor,  
4 aka El Viejo, JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek,  
5 CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, and SERGIO  
6 KAISER-CHAVEZ, aka Zepi, aka Cepillin, obtained substantial income  
7 and resources; in violation of Title 21, United States Code,  
8 Section 848(b).

9 Count 4

10 CONSPIRACY TO LAUNDER MONEY

11 Beginning on a date unknown to the grand jury and continuing up  
12 to and including February 28, 2007, within the Southern District of  
13 California, and elsewhere, defendants VICTOR EMILIO CAZARES-  
14 GASTELLUM, aka Victor Emilio Cazares-Salazar, aka Licenciado,  
15 aka Lic, aka El Señor, aka El Viejo, JOSE OSCAR DEL CASTILLO-  
16 GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie,  
17 aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin,  
18 GILBERT VASQUEZ-CHAVEZ, aka Vaca, aka Luis Miguel, aka Gil, and ELISA  
19 VALENZUELA PENA, aka Melissa, did knowingly and intentionally agree  
20 and conspire with each other, and with other persons known and  
21 unknown to the grand jury, to knowingly and willfully transfer and  
22 transmit funds to a place outside the United States from a place  
23 inside the United States with the intent to promote the carrying on  
24 of specified unlawful activity, that is, the importation,  
25 distribution and possession with the intent to distribute controlled

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1 substances; in violation of Title 18, United States Code,  
2 Section 1956(a)(2)(A); all in violation of Title 18, United States  
3 Code, Section 1956(h).

4 **Count 5**

5 **DISTRIBUTION OF A CONTROLLED SUBSTANCE**

6 On or about March 2, 2006, within the Southern District of  
7 California, defendants CARLOS CUEVAS JR., aka Charlie, aka Sapo,  
8 aka Negro, and LUIS EDUARDO ALVAREZ, aka Lalo, did knowingly and  
9 intentionally distribute 5 kilograms and more, to wit: approximately  
10 207 kilograms (455 pounds) of cocaine, a Schedule II Controlled  
11 Substance; in violation of Title 21, United States Code,  
12 Section 841(a)(1), and Title 18, United States Code, Section 2.

13 **Count 6**

14 **IMPORTATION OF A CONTROLLED SUBSTANCE**

15 On or about April 28, 2006, within the Southern District of  
16 California, defendants CARLOS CUEVAS JR., aka Charlie, aka Sapo,  
17 aka Negro, SANTOS FABIAN ROCHA-SALAZAR, aka Pariente, aka Chino,  
18 ROSARIO GARCIA-CARDENAS, aka Chayo, and MIGUEL ANGEL CARDENAS GARCIA,  
19 aka Mickey Mouse, aka Mike, did knowingly and intentionally import  
20 5 kilograms and more, to wit: approximately 31 kilograms (68 pounds)  
21 of cocaine, a Schedule II Controlled Substance; in violation of  
22 Title 21, United States Code, Sections 952 and 960, and Title 18,  
23 United States Code, Section 2.

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Count 7

POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE

On or about April 28, 2006, within the Southern District of California, defendants CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, SANTOS FABIAN ROCHA-SALAZAR, aka Pariente, aka Chino, ROSARIO GARCIA-CARDENAS, aka Chayo, and MIGUEL ANGEL CARDENAS GARCIA, aka Mickey Mouse, aka Mike, did knowingly and intentionally possess, with intent to distribute 5 kilograms and more, to wit: approximately 31 kilograms (68 pounds) of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count 8

IMPORTATION OF A CONTROLLED SUBSTANCE

On or about May 30, 2006, within the Southern District of California, defendants JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, and GASPAR PUENTES HERRERA, aka Casper, aka Gasparin, did knowingly and intentionally import approximately 74 kilograms (162 pounds) of marijuana, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, and Title 18, United States Code, Section 2.

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**Count 9****IMPORTATION OF A CONTROLLED SUBSTANCE**

On or about June 7, 2006, within the Southern District of California, defendants CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, GILBERT VASQUEZ-CHAVEZ, aka Vaca, aka Luis Miguel, aka Gil, JOSE ISMAEL URQUIZA, aka Conchi, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, LUIS EDUARDO ALVAREZ, aka Lalo, and ARTURO FLORES MEDINA, did knowingly and intentionally import 5 kilograms and more, to wit: approximately 174 kilograms (383 pounds) of cocaine, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, and Title 18, United States Code, Section 2.

**Count 10****IMPORTATION OF A CONTROLLED SUBSTANCE**

On or about July 8, 2006, within the Southern District of California, defendants CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, and SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, did knowingly and intentionally import approximately 64 kilograms (140 pounds) of marijuana, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, and Title 18, United States Code, Section 2.

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1 Count 11

2 IMPORTATION OF A CONTROLLED SUBSTANCE

3 On or about August 8, 2006, within the Southern District of  
4 California, defendants CARLOS CUEVAS JR., aka Charlie, aka Sapo,  
5 aka Negro, and SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, (charged  
6 elsewhere) did knowingly and intentionally import 5 kilograms and  
7 more, to wit: approximately 51 kilograms (112 pounds) of cocaine, a  
8 Schedule II Controlled Substance; in violation of Title 21, United  
9 States Code, Sections 952 and 960, and Title 18, United States Code,  
10 Section 2.

11 Count 12

12 IMPORTATION OF A CONTROLLED SUBSTANCE

13 On or about August 28, 2006, within the Southern District of  
14 California, defendants CARLOS CUEVAS JR., aka Charlie, aka Sapo,  
15 aka Negro, and SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, LUIS  
16 EDUARDO ALVAREZ, aka Lalo, CARLOS VALLE-CASTORENA, aka Carrocero,  
17 aka Pintor, JOSE ISMAEL URQUIZA, aka Conchi, and ROBERTO DANIEL  
18 LOPEZ, did knowingly and intentionally import 5 kilograms and more,  
19 to wit: approximately 45 kilograms (99 pounds) of cocaine, a  
20 Schedule II Controlled Substance; in violation of Title 21, United  
21 States Code, Sections 952 and 960, and Title 18, United States Code,  
22 Section 2.

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**Count 13****IMPORTATION OF A CONTROLLED SUBSTANCE**

On or about September 15, 2006, within the Southern District of California, defendants JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, GASPAS PUENTES HERRERA, aka Casper, OCTAVIO AMEZCUA, aka Russo, and ARTURO GUARDADO-CHAIDEZ, did knowingly and intentionally import approximately 38 kilograms (85 pounds) of marijuana, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, and Title 18, United States Code, Section 2.

**Count 14****POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE**

On or about September 15, 2006, within the Southern District of California, defendants JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, GASPAS PUENTES HERRERA, aka Casper, OCTAVIO AMEZCUA, aka Russo, and ARTURO GUARDADO-CHAIDEZ, did knowingly and intentionally possess, with intent to distribute, approximately 38 kilograms (85 pounds) of marijuana, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

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**Count 15****IMPORTATION OF A CONTROLLED SUBSTANCE**

On or about October 6, 2006, within the Southern District of California, defendants CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, CARLOS VALLE-CASTORENA, aka Carrocero, aka Pintor, KARLO HUMBERTO ARMENTA-OCAMPO, aka Pescador, JOSE ISMAEL URQUIZA, aka Conchi, and MIGUEL ANGEL CARDENAS GARCIA, aka Mickey Mouse, aka Mike, did knowingly and intentionally import 5 kilograms and more, to wit: approximately 21 kilograms (46 pounds) of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, and Title 18, United States Code, Section 2.

**Count 16****POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE**

On or about October 10, 2006, within the Southern District of California, defendants JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, CARLOS VALLE-CASTORENA, aka Carrocero, aka Pintor, KARLO HUMBERTO ARMENTA-OCAMPO, aka Pescador, JOSE ISMAEL URQUIZA, aka Conchi, and MIGUEL ANGEL CARDENAS GARCIA, aka Mickey Mouse, aka Mike, did knowingly and intentionally possess, with intent to distribute, 50 grams and more, to wit: approximately 33 kilograms (73 pounds) of ice methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

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Count 17

POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE

On or about November 26, 2006, within the Southern District of California, defendants CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, and OCTAVIO AMEZCUA, aka Russo, did knowingly and intentionally possess, with intent to distribute, 100 kilograms and more, to wit: approximately 325 kilograms (715 pounds) of marijuana, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

Drug Trafficking Forfeiture

The allegations contained in Counts 1 through 3 are realleged and by reference are fully incorporated herein to allege forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

1. As a result of the commission of the felony offenses alleged in Counts 1 through 3, a violation punishable by imprisonment for more than one year, and pursuant to Title 21, United States Code, Section 853(a)(1), defendants VICTOR EMILIO CAZARES-GASTELLUM, aka Victor Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El Señor, aka El Viejo, JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, SANTOS FABIAN ROCHA SALAZAR, aka Pariente, aka Chino, CARLOS VALLE-CASTORENA, aka Carrocero, aka Pintor, MIGUEL ANGEL CARDENAS GARCIA, aka Mickey Mouse, aka Mike, JOSE ISMAEL URQUIZA, aka Conchi, LUIS EDUARDO

1 ALVAREZ, aka Lalo, GILBERT VASQUEZ-CHAVEZ, aka Vaca, aka Luis Miguel,  
 2 aka Gil, OCTAVIO AMEZCUA, aka Russo, ROSARIO GARCIA-CARDENAS,  
 3 aka Chayo, GASPAR PUENTES HERRERA, aka Casper, ARTURO GUARDADO-  
 4 CHAIDEZ, KARLO HUMBERTO ARMENTA-OCAMPO, aka Pescador, ARTURO FLORES  
 5 MEDINA, TONY RAMOS, aka Antonio Ramos-Amezcu, and ROBERTO DANIEL  
 6 LOPEZ, shall, upon conviction, forfeit to the United States all their  
 7 rights, title, and interest in all property constituting, and derived  
 8 from, any proceeds the defendants obtained, directly or indirectly,  
 9 as the result of the commission of the violations alleged in Counts  
 10 1 through 3 of this Indictment, including but not limited to  
 11 \$38,162,500.00 in United States currency and all interest and  
 12 proceeds traceable thereto.

13 2. Also as a result of the commission of the felony offense  
 14 alleged in Counts 1 through 3, a violation punishable by imprisonment  
 15 for more than one year, and pursuant to Title 21, United States Code,  
 16 Section 853(a)(2), defendants VICTOR EMILIO CAZARES-GASTELLUM,  
 17 aka Victor Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El  
 18 Señor, aka El Viejo, JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama,  
 19 aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro,  
 20 SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, SANTOS FABIAN ROCHA  
 21 SALAZAR, aka Pariente, aka Chino, CARLOS VALLE-CASTORENA,  
 22 aka Carrocero, aka Pintor, MIGUEL ANGEL CARDENAS GARCIA, aka Mickey  
 23 Mouse, aka Mike, JOSE ISMAEL URQUIZA, aka Conchi, LUIS EDUARDO  
 24 ALVAREZ, aka Lalo, GILBERT VASQUEZ-CHAVEZ, aka Vaca, aka Luis Miguel,  
 25 aka Gil, OCTAVIO AMEZCUA, aka Russo, ROSARIO GARCIA-CARDENAS,  
 26 aka Chayo, GASPAR PUENTES HERRERA, aka Casper, ARTURO GUARDADO-  
 27 CHAIDEZ, KARLO HUMBERTO ARMENTA-OCAMPO, aka Pescador, ELISA  
 28

1 VALENZUELA PENA, aka Melissa, ARTURO FLORES MEDINA, TONY RAMOS,  
2 aka Antonio Ramos-Amezcuca, and ROBERTO DANIEL LOPEZ, shall, upon  
3 conviction, forfeit to the United States all their rights, title, and  
4 interest in all property used and intended to be used in any manner  
5 or part to commit or to facilitate the commission of the violation  
6 alleged in Counts 1 through 3 of this indictment, including but not  
7 limited to the following:

8 a. 336 Jackrabbit Drive, El Centro, CA 92243, and all  
9 appurtenances affixed thereto. The real property is more  
10 particularly described as:

11 APN No. 054-527-21

12 Lot 26, Countryside Subdivision Unit No. 5, in the city of  
13 El Centro, County of Imperial, state of California,  
14 According to map on file in book 22, page 47 of final maps  
on file in the office of the County Recorder of Imperial  
County.

15 3. If any of the forfeitable property referred to above, as  
16 a result of any act or omission of the defendants,

- 17 a. cannot be located upon the existence of due  
18 diligence;  
19 b. has been transferred or sold to or deposited with a  
20 third person;  
21 c. has been placed beyond the jurisdiction of the Court;  
22 d. has been substantially diminished in value; or  
23 e. has been commingled with other property which cannot  
24 be subdivided without difficulty;

25 it is the intent of the United States, pursuant to Title 21, United  
26 States Code, Section 853(p), to seek forfeiture of any other property  
27 of the defendants up to the value of the above forfeited property.  
28

**Money Laundering Forfeiture**

The allegations contained in Count 4 are realleged and by reference are fully incorporated herein to allege forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

1. As a result of the commission of the felony offense alleged in Count 4, said violation being punishable by imprisonment for more than one year, and pursuant to Title 18, United States Code, Section 982(a)(1), defendants VICTOR EMILIO CAZARES-GASTELLUM, aka Victor Emilio Cazares-Salazar, aka Licenciado, aka Lic, aka El Señor, aka El Viejo, JOSE OSCAR DEL CASTILLO-GALLARDO, aka Chama, aka Shrek, CARLOS CUEVAS JR., aka Charlie, aka Sapo, aka Negro, SERGIO KAISER-CHAVEZ, aka Zepi, aka Cepillin, GILBERT VASQUEZ-CHAVEZ, aka Vaca, aka Luis Miguel, aka Gil, and ELISA VALENZUELA PENA, aka Melissa, shall, upon conviction, forfeit to the United States all rights, title and interest in any and all property involved in such offense, and any property traceable to such property, including but not limited to \$1,953,225.00 in United States currency and all interest and proceeds traceable thereto.

All in violation of Title 18, United States Code, Section 982.

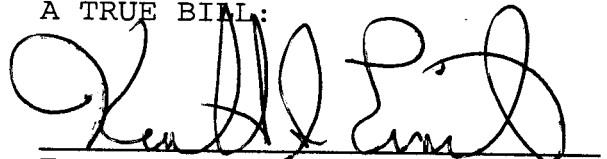
2. If any of the above-described forfeitable property, as a result of any act or omission of the defendants -

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

1 e. has been commingled with other property which cannot  
2 be subdivided without difficulty;  
3 it is the intent of the United States, pursuant to Title 21, United  
4 States Code, Section 853(p) and Title 18, United States Code,  
5 Section 982(b), to seek forfeiture of any other property of the  
6 defendants up to the value of the said property listed above as being  
7 subject to forfeiture.


8 DATED: February 23, 2007.

9 A TRUE BILL:

10   
11 Foreperson

12 KAREN P. HEWITT  
13 United States Attorney

14  
15 By:

  
16 MICHAEL F. KAPLAN  
17 Assistant U.S. Attorney  
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SOUTHERN DISTRICT OF CALIFORNIA

BY Bm REPORT

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2006 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

VICTOR EMILIO  
CAZARES-GASTELLUM (1),  
aka Victor Emilio  
Cazares-Salazar,  
aka Licenciado,  
aka Lic,  
aka Viejo,  
JOSE OSCAR DEL  
CASTILLO-GALLARDO (2),  
aka Chama,  
aka Shrek,  
CARLOS CUEVAS JR. (3),  
aka Charlie,  
aka Sapo,  
aka Negro,  
SERGIO KAISER-CHAVEZ (4),  
aka Zepi,  
aka Cepillin,  
SANTOS FABIAN ROCHA SALAZAR (5),  
aka Pariente,  
aka Chino,  
CARLOS VALLE-CASTORENA (6),  
aka Carrocero,  
aka Pintor,

Criminal Case No. 07 CR 0449

WQH

I N D I C T M E N T

Title 21, U.S.C., Secs. 846 and  
841(a)(1) - Conspiracy to  
Import a Controlled Substance;  
Title 21 U.S.C.,  
Secs. 952, 960 and 963 -  
Conspiracy to Distribute a  
Controlled Substance; Title 21,  
U.S.C., Secs. 848(a) and (b) -  
Continuing Criminal Enterprise;  
Title 18, U.S.C., Sec. 1956(h) -  
Conspiracy to Launder Monetary  
Instruments; Title 21, U.S.C.,  
Sec. 841(a)(1) - Distribution of  
a Controlled Substance;  
Title 21, U.S.C., Secs. 952 and  
960 - Importation of a Controlled  
Substance; Title 21, U.S.C.,  
Sec. 841(a)(1) - Possession with  
Intent to Distribute a Controlled  
Substance; Title 18, U.S.C.,  
Sec. 2 - Aiding and Abetting;  
Title 21, U.S.C., Sec. 853 -  
Criminal Forfeiture

MLK/OBG:jla:San Diego  
2/23/07